STATEMENT OF LEGAL AND FACTUAL BASIS

Acadia Polymers
Route 1705, Tannery Road
Iron Gate, Virginia
Permit No. VA-20391

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Acadia Polymers has applied for a Title V Operating Permit for its facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Date: July 13, 2001

FACILITY INFORMATION

Permittee
The Jordan Group
9 West 57th Street
New York, NY 10019

Facility
Acadia Polymers
P. O. Box 529
Clifton Forge, VA 24422

AIRS ID No. 51-005-0013

SOURCE DESCRIPTION

SIC Code: 3069

This manufacturing plant produces specialty rubber compounds and specialty rubber parts. The plant has three operating divisions: Central Mixing, Business Machines, and Bonded Piston Seals. Each division is described below. In addition, the plant operates three boilers. Each boiler operates on natural gas with Number 2 Fuel Oil back-up. Under typical plant operation only one boiler is in operation. All three boilers were installed prior to requirements for NSR Permits.

Central Mixing: This operating unit manufactures specialty rubber compounds for use in the other units and at other locations. Batch ingredients are prepared from natural and/or synthetic rubber, carbon black, oils, and additives for producing desired properties in the finished compound. The raw ingredients are placed in one of four mixers and blended into a homogenous mixture. The mixture is then processed into sheets of rubber compound. The sheets are typically passed through a dip tank to cool and coat the surface to prevent the sheet from sticking together. The finished sheets are used in the other units or shipped off-site.

Business Machines: This operating unit applies molded rubber to metal substrates primarily but not exclusively for use in business machines. The major products from this section are the coated rollers for copy machines and printers. The metal components are prepared by aqueous cleaning or limited solvent cleaning which may be followed by grit blasting. Some substrates receive an adhesive coating. Next the rubber is applied in a molding and curing process. The cured parts are finished to specification by grinding.

Bonded Piston Seals: Products in this section consist of extruded rubber parts and molded parts with a metal substrate. Typically the rubber portion of the product is extruded for these products. The substrates undergo aqueous cleaning, solvent cleaning, and/or adhesive application. The rubber coating is then molded and cured on the substrate. Some of the products are finished to specification by grinding. A portion of the product line of this section consists of extruded rubber parts that are not molded.

The facility is a Title V major source of Hazardous Air Pollutants and Volatile Organic Compounds, plus SO2 (PTE of 230 tons/yr for maximum ASTM spec of 1% sulfur and 115 tons/yr for commonly available 0.5% sulfur) in the unlikely event of all three boilers run at maximum rate on back-up fuel for 8760 hours per year. This source is located in an attainment area for all pollutants, and is a PSD minor source. The point sources at the facility were previously permitted under several Minor NSR Permits issued between 1991 and 1993. These permits were combined into a single Minor NSR Permit issued on April 17, 2000, which superseded the previous permits and revised throughput requirements to achieve greater flexibility in the manufacturing process. No NSPS, MACT or NESHAP requirements presently apply to this facility.

COMPLIANCE STATUS

The facility is inspected at least once per year. The facility is in compliance with the State Air Pollution Control Board regulations.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emission units are grouped as follows:

EU-C	Combustion Sources	Three natural gas boilers with fuel oil back-up, all over 10 MMBTU/hr
EU- CM	Central Mixing	Mixers, mills, and sheeters
EU-BMO	Business Machines	Spray booth, molding line, ovens
EU-BPS	Bonded Piston Seals	Mills, spray booths, molds, extruders

Details are summarized in the table below:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device Description (PCD)	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
EU-C-14	14	Kewanee Boiler (H25600502)	25.11 MMBTU/hr	None	NA	NA	NA
EU-C-19	19	Cleaver Brooks Boiler (LR619-15)	12.50 MMBTU/hr	None	NA	NA	NA
EU-C-20	20	Cleaver Brooks Boiler (LR407-35)	14.70 MMBTU/hr	None	NA	NA	NA
Central Mixing (EU-CM)							
EU-CM-1	1	60” Open Mix Silicone Mill	657.0 tpy	None	NA	NA	NA
EU-CM-2	2	84” Open Mix Color Mill	1,314.0 tpy	None	NA	NA	NA
EU-CM-3	44	Carbon Black Debagging Slitter	876.0 tpy	Baghouse	44	PM	4/17/00
EU-CM-43	43	3D Mill (below Internal Mixers)	6,570.0 tpy	None	NA	NA	NA
EU-CM-44a	44	3D Ferrell Internal Mixer	6,570.0 tpy	Baghouse	44	PM	4/17/00
EU-CM-44b	44	#10 Stewart Boling Internal Mixer	13,140.0 tpy	Baghouse	44	PM	4/17/00
EU-CM-45	45	#10 Sheeter Mill (below Internal Mixers)	13,140.0 tpy	None	NA	NA	NA
Business Machines (EU-BMO)							
EU-BMO-11	11	Fluoroelastomer Spray Booth	257.5 tpy	Water Curtain	11	PM	4/17/00

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device Description (PCD)	PCD ID	Pollutant Controlled	Applicable Permit Date
Bonded Piston Seals (EU-BPS)							
EU-BPS-29	29	Binks Spray Booth	1.46 gal/hr	Dry overspray filter	29	PM	4/17/00
EU-BPS-30	30	Binks Spray Booth	1.46 gal/hr	Dry overspray filter	30	PM	4/17/00
EU-BPS-32	32	Adhesive Spray Booth		Paper filter	32	PM	NA
EU-BPS-33	33	Adhesive Spray Booth		Paper filter	33	PM	NA
EU-BPS-34	34	Adhesive Spray Booth		Paper filter	34	PM	NA
EU-BPS-35	35	Adhesive Spray Booth		Paper filter	35	PM	NA

* The Size/Rated Capacity is provided for informational purposes only, and is not an applicable requirement

EMISSIONS INVENTORY

Emissions are summarized in the following tables:

1997 Actual Emissions from Title V permit application

Emission Unit	Criteria Pollutant Emission in tons/year				
	VOC	CO	SO_2	PM-10	NO_X
EU-C	0.11	1.68	0.01	0.15	2.00
EU-CM	0.51	NA	NA	0.62	NA
EU-BMO	10.73	NA	NA	0.03	NA
EU-BPS	26.91	NA	NA	0.15	NA
Total	38.26	1.68	0.01	0.95	2.00

1997 Facility Hazardous Air Pollutant (HAP) Emissions from Title V permit application:

Estimated HAP Emissions for 1997: 31.66 tons

EMISSION UNIT APPLICABLE REQUIREMENTS

New Source Review Permit Requirements

The majority of conditions contained in the federal operating permit are requirements necessary to comply with the conditions of the New Source Review permit for the facility issued April 17, 2000. A Copy of the permit is attached as Appendix A. Conditions of the federal operating permit derived from the NSR permit and the corresponding NSR permit conditions are displayed in the table below:

Title V Condition	NSR Condition	Description	VAC Applicable Requirement
III-C-1	9	Provide test ports at appropriate locations on request	9 VAC 5-50-30
IV-A-1	3	BACT mixer particulate discharge	9 VAC 5-50-260
IV-A-2	11	Production limit on elastomer mixing	9 VAC 5-80-10
IV-A-3	6	BACT as specified in design limit for appropriate control device	9 VAC 5-50-260
IV-A-4	7	Instrumentation to demonstrate proper equipment function	9 VAC 5-80-10, 9 VAC 5-50-20, 9 VAC 5-50-260
IV-A-5	8	Periodic monitoring for proper control device function	9 VAC 5-50-50
IV-A-6	10	Proper particulate disposal	9 VAC 5-170-160
IV-A-7	17	Visible emission limits for mixers, bag-house, (and NSR permitted spray booths)	9 VAC 5-50-80, 9 VAC 5-50-260
IV-A-8	14	Particulate emission limits for mixers	9 VAC 5-50-260
IV-B-1	20a	Record of elastomer production in mixing	9 VAC 5-50-50
IV-B-3	20h	Baghouse differential pressure records	9 VAC 5-50-50
IV-B-4	20k	Baghouse maintenance & training records	9 VAC 5-50-50
IV-C-1	9	Provide test ports at appropriate locations on request	9 VAC 5-50-30
IV-C-2	18	Continuing compliance tests for baghouse	9 VAC 5-50-30
IV-C-3	19	Continuing compliance tests for baghouse, (and NSR permitted spray booths)	9 VAC 5-50-30
V-A-1	4	BACT Fluoroelastomer spray booth particulate discharge	9 VAC 5-50-260
V-A-2	12	Throughput limit on VOC content of fluoroelastomer coatings	9 VAC 5-80-10
V-A-3	17	Visible emission limits for NSR permitted spray booths , (mixers, and baghouse)	9 VAC 5-50-80, 9 VAC 5-50-260
V-A-4	15	VOC emission limit for fluoroelastomer spray booth	9 VAC 5-50-260
V-B-1	20b	Record of fluoroelastomer spray booth coating throughput	9 VAC 5-50-50
V-B-2	20d	Record of fluoroelastomer spray booth VOC throughput	9 VAC 5-50-50
V-B-3	20f	Record of fluoroelastomer spray booth HAPs throughput	9 VAC 5-50-50
V-B-4	20j	MSDS for coatings in NSR permitted spray booths	9 VAC 5-50-50
Title V	NSR	Description	VAC Applicable Requirement

Condition	Condition		
V-C-1	9	Provide test ports at appropriate locations on request	9 VAC 5-50-30
V-C-2	19	Continuing compliance tests for NSR permitted spray booths (and baghouse)	9 VAC 5-50-30
VI-A-1	5	BACT Binks adhesive spray booth particulate discharge	9 VAC 5-50-260
VI-A-2	13	Throughput limit on VOC content of Binks spray booth coatings	9 VAC 5-80-10
VI-A-3	17	Visible emission limits for NSR permitted spray booths , (mixers, and baghouse)	9 VAC 5-50-80, 9 VAC 5-50-260
VI-A-5	16	VOC emission limit for Binks adhesive spray booths	9 VAC 5-50-260
VI-B-1	20c	Record of Binks adhesive spray booths coating throughput	9 VAC 5-50-50
VI-B-3	20e	Record of Binks adhesive spray booths VOC throughput	9 VAC 5-50-50
VI-B-5	20g	Record of Binks adhesive spray booths HAPs throughput	9 VAC 5-50-50
VI-B-7	20i	MSDS for coatings in NSR permitted spray booths	9 VAC 5-50-50
VI-C-1	9	Provide test ports at appropriate locations on request	9 VAC 5-50-30
VI-C-2	19	Continuing compliance tests for NSR permitted spray booths (and baghouse)	9 VAC 5-50-30
VII-A-1	26	Maintenance & operation practice	9 VAC 5-50-20
VII-A-2	25	Reduction or shutdown to avoid violation	9 VAC 5-20-180
VII-C-5	20j	Records of stack tests & VEEs	9 VAC 5-50-50
VII-D-1	9	Provide test ports at appropriate locations on request	9 VAC 5-50-30
VII-E-1	21	Long term malfunction report	9 VAC 5-20-180
VII-E-2	23	Notice of control equipment maintenance	9 VAC 5-20-180
X-F	24	Malfunction causing exceedence report	9 VAC 5-20-180
X-L	29	Registration/update	9 VAC 5-170-60, 9 VAC 5-20-160
X-Q	22	Right of entry	9 VAC 5-170-130
X-S	30	Permit Copy	9 VAC 5-170-160
X-T	28	Change of ownership	9 VAC 5-80-10
X-V	27	Permit suspension/revocation	9 VAC 5-80-10

Emission Inventory Related Requirements

The permit content requirements of the regulations for federal operating permits, 9 VAC 5-80-110, state that the permit should include conditions necessary determine the annual emissions of all pollutants for which the facility has the potential to be major. This coincides with the underlying philosophy of the Title V legislation which had as one of its purposes to achieve a more detailed picture of emissions from major source facilities, many of which had units pre-dating NSR requirements. The table below summarizes the conditions which are needed to develop emission estimates for equipment that was installed prior to NSR permitting requirements.

Permit Condition	Relation to Emission Inventory

III-B-1	Supports sulfur content variable in emission factor in III-B-2
III-B-2	Records necessary to document estimates of VOC, SO_2, NOx, CO, and PM from fuel burning equipment*
IV-B-2	Requires estimate of VOC and HAPs from equipment for which these pollutants were deemed negligible in the NSR permit
VI-B-2	Records of data necessary to support estimate in VI-B-4 & VI-B-6
VI-B-4	VOC emissions from source installed prior to NSR requirement
VI-B-6	HAP emissions from source installed prior to NSR requirement
VII-C-1	Records miscellaneous VOC and HAP emissions from production related activities other than the equipment previously specified
VII-C-2	Requires facility wide totals of VOC and HAP emissions
VII-C-3	Records of data necessary to support emissions in VII-C-1

* The facility is not major for NOx, CO and PM but these record keeping requirements were added at the request of the facility to expedite compilation of information for the annual emission inventory.

Significance of Emissions Units

There is no concise definition in either 9 VAC 5-80-720 or 40 CFR 63.44 of what constitutes a significant or insignificant emission source for HAPs. Estimates for the 1998 calendar year indicate HAP emissions of less than 0.01 tons per year for the equipment listed as insignificant in the BMO section of the plant and HAP emissions of less than 0.2 tons per year in the BPS section of the plant. These estimates are based on emission factors developed by the Rubber Manufacturers Association, which are subject to change, and are dependent on the composition of the rubber processed during the year, which is also subject to change. Based on the best estimates for 1998, it would appear that the designation of ovens, presses and extruders as insignificant is reasonable, however, the lack of a concise definition of HAP insignificance combined with factors subject to change make this assessment more problematic in the future. Clearly annual emission estimates for the ovens, presses, and extruders, on a monthly basis, is not warranted under recent production. Due to the likelihood that HAP estimates from these sources may increase either from changes in production or refined emission factors during the duration of this permit, the facility will be required to re-evaluate emissions from these sources at the end of each calendar year to confirm that the units in question are still insignificant.

The conditions required for this assessment are V-B-5 to require an annual estimates for the BMO section, V-B-6 to record the operating hours necessary for that estimate, VI-B-7 to require an annual estimates for the BPS section, VI-B-8 to record the operating hours necessary for that estimate.

Periodic Monitoring

The permit content requirements of the regulations for federal operating permits, 9 VAC 5-80-110, state that the permit should include conditions for periodic monitoring sufficient to demonstrate that the facility is in compliance with the limits of the permit. The record keeping requirements are deemed sufficient to determine compliance with the emission limits for VOCs. Compliance with opacity limits is considered sufficient to demonstrate compliance with the emission limits for PM and PM-10. No opacity is expected to be observed under normal operation of the equipment. Under these conditions, a weekly Method 22 evaluation with requirement for Method 9 evaluation if opacity is observed is deemed sufficient to satisfy the periodic monitoring requirement.

Condition IV-C-2 allows performance testing of the baghouse upon request. The limitation on baghouse emissions in IV-A-3 is derived from the NSR permit and was based on the manufacturer's rating. The monitoring requirements for opacity and differential pressure demonstrate proper performance and are considered adequate indications that the emission limit has not been exceeded.

Condition VII-B-1 requires Method 22 evaluation of the baghouse and spray booths and, if opacity is observed, documentation of corrective action or a Method 9 evaluation to show the opacity is within permit limits.

Condition VII-C-4 requires that records of the periodic monitoring results be maintained.

Visible Emissions Limits

The standard for visible emissions in the Commonwealth of Virginia, unless specified more stringently for a specific application, is defined under 9 VAC 5-40-80 as no visible emissions greater than 20% opacity except for one six minute period in any one hour of not greater than 60% opacity. This standard is incorporated into the Title V operating permit for the sources installed prior to requirements for an NSR permit. (Note that the alternate standard for fuel burning equipment, 9 VAC 5-40-940, has identical limits.)

Condition III-A-3 sets the minimum visible emissions limit on the three boiler stacks.

Condition VI-A-4 sets the minimum visible emission limits on spray booths EU-BPS-32 through EU-BPS-35.

Proper Equipment Operation

It is the practice of the Virginia Department of Environmental Quality to require in emission permits conditions that the emission source be operated in a proper manner. These conditions fall into two categories. The first category is a general condition requiring proper operation and maintenance of equipment which applies under 9 VAC 5-170-160 for equipment in an NSR permit or existing equipment ancillary to the operation of the permitted equipment. The second category is specifications that equipment designed to operate under specific parameters be operated only under those parameters. These conditions are specifically addressed under 9 VAC 5-80-10 for equipment in a construction permit but for existing equipment in an operating permit that is not subject

to a construction permit, 9 VAC 5-40-20 E and 9 VAC 5-170-160 are the requirements generally deemed to be applicable.

Condition III-A-4 is a general condition for proper operation of boilers installed prior to NSR permitting requirements.

Condition III-B-3 is a requirement to maintain records supporting compliance with Condition III-A-4.

Condition III-A-1 requires that the boilers operate using only the fuels upon which they were designed to operate (natural gas and No. 2 Fuel Oil).

Condition III-A-2 requires that any No. 2 Fuel Oil used in the boilers meets the normal sulfur content specification for such fuel oil.

Taken together, these conditions define a scenario in which the proper operation of the boilers at this facility are physically incapable of violating the particulate matter and sulfur dioxide standards for fuel burning equipment, 9 VAC 5-40-900 and 9 VAC 5-40-930. Using these conditions allows the permit to be written without explicit limits for PM and SO_2, which would entail burdensome periodic monitoring requirements.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions, including those caused by upsets, within one business day.

INAPPLICABLE REQUIREMENTS

Citation	Title of Citation	Description of Applicability
40 CFR 60 Subpart Dc	NSPS for Small Steam Generators	All units constructed prior to 6/23/84
40 CFR 60 Subpart K	NSPS for Storage Vessels	No vessels with capacity > 40,000 gal
40 CFR 60 Subpart Kb	NSPS for VOL Storage Vessels	All vessels constructed prior to 6/23/84
40 CFR 63 Subpart H	NES for Equipment Leaks	Styrene/butadiene is mixed but not manufactured at the facility

STREAMLINED REQUIREMENTS

Citation	Title of Citation	Fuel Restrictions as Alternative
9 VAC 5-40-900	Particulate Matter Standard for Fuel Burning Equipment	Conditions III-A-1 and III-A-4 insure that equipment cannot exceed this emission standard
9 VAC 5-40-930	Sulfur Dioxide Standard for Fuel Burning Equipment	Conditions III-A-1, III-A-2, and III-A-4 insure that equipment cannot exceed this emission standard

The facility has three boilers rated at 25.11 MMBTU/hr, 12.50 MMBTU/hr, and 14.70 MMBTU/hr. We assume a worst case of all three boilers operating at maximum capacity burning back-up No. 2 fuel oil. (We note that the facility is designed such that the two smaller boilers supply more than the maximum heat requirements at less than full capacity.)

Demonstration that restriction to natural gas and No. 2 fuel oil is equivalent to meeting the particulate emission requirement of 9 VAC 5-40-900.

Combined heat capacity of all boilers: 52.31 MMBTU/hr

From 9 VAC 5-40-900:

maximum PM emission = 1.0906(52.31)exp(-0.2594)
= 0.3907 lb/MMBTU

From USEPA APTI #427 Combustion Evaluation Manual:
average heat content of No. 2 fuel oil: 141,000 BTU/gal

From USEPA manual AP-42 for No. 2 fuel oil:
Particulate emission factor for No. 2 fuel oil: 2 lb/thousand gallons

Combined boiler maximum fuel capacity:

52,310,000 BTU/hr / 141,000 BTU/gal = 371 gal/hr

371 gal/hr x 0.002 lb PM/gal = 0.742 lb/hr

0.742 lb/hr / 52.31 MMBTU/hr = 0.0142 lb/MMBTU

Therefore the maximum worst case PM emission from this equipment being properly operated is less than $1/25^{th}$ of regulatory standard. Additional permit requirements to explicitly demonstrate compliance with this standard are not warranted.

Demonstration that restriction to natural gas and No. 2 fuel oil is equivalent to meeting the particulate emission requirement of 9 VAC 5-40-930.

Combined heat capacity of all boilers: 52.31 MMBTU/hr

From 9 VAC 5-40-930:

maximum sulfur emission = 2.64(52.31)
= 138.1 lb/hr

From USEPA APTI #427 Combustion Evaluation Manual:

average heat content of No. 2 fuel oil: 141,000 BTU/gal

From USEPA manual AP-42 for No. 2 fuel oil:

SO_2 emission factor for No. 2 fuel oil: 142S lb/thousand gallons
where S= maximum sulfur content.

From permit S= 0.5 so SO_2 emission factor is 71 lb/thousand gal

Combined boiler maximum fuel capacity:

52,310,000 BTU/hr / 141,000 BTU/gal = 371 gal/hr

371 gal/hr x 0.071 lb SO_2/gal = 26.34 lb/hr

Therefore the maximum worst case SO_2 emission from this equipment being properly operated is less than $1/5^{th}$ of regulatory standard. Additional permit requirements to explicitly demonstrate compliance with this standard are not warranted.

INSIGNIFICANT EMISSION UNITS

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
4	BPS Warm Up Mill	B	VOC, HAP	N/A
5	QA/QC Laboratory Oven	A	VOC	N/A
6	QA/QC Laboratory Oven	A	VOC	N/A
7	QA/QC Laboratory Oven	A	VOC	N/A
8	QA/QC Laboratory Oven	A	VOC	N/A
9	Gruenburg Oven (NG)	C	CO, SO2, NOx, VOC, HAP, PM	1.00 MMBTU/hr
10	Fluoroelastomer Drying Oven	B	VOC, HAP	N/A
12	BMO Curing Oven	B	VOC, HAP	N/A
13	BMO Curing Oven	B	VOC, HAP	N/A
21	Three QA/QC Lab Cure Ovens	A	VOC	N/A
22, 49	Welding	B	PM, metals	N/A
23	Electric Oven	B	PM, VOC, HAPs	N/A
24	Michigan Oven Co. (NG oven)	C	CO, SO2, NOx, VOC, HAP, PM	1.00 MMBTU/hr
27	Electric Recure Oven	B	PM, VOC, HAPs	N/A
28	Electric Recure Oven	B	PM, VOC, HAPs	N/A
31	Binks Oven (SCS-10/20/2/G-3)	C	CO, SO2, NOx, VOC, HAP, PM	0.20 MMBTU/hr
37	Paint Storage	B	VOC	N/A
38, 39, 40	Lathe Operation	B	PM	N/A
48	Heat Treat Oven (electric)	B	PM, VOC, HAPs	N/A
50	Three electric ovens	B	PM, VOC, HAPs	N/A
51	Solvent spot cleaning (by hand)	B	VOC	N/A
52	Solvent spot cleaning (by hand)	B	VOC	N/A
53	Electric Oven	B	PM, VOC, HAPs	N/A
54	Phosphate Cleaning Fume Hood	A	PM	N/A
55	Steam Vulcanizer	B	PM, VOC, HAPs	N/A
58	Two Recure Ovens (electric)	B	PM, VOC, HAPs	N/A
60	Electric Oven	B	PM, VOC, HAPs	N/A
61	Electric Oven	B	PM, VOC, HAPs	N/A
70	Development Lab Electric Oven	B	PM, VOC, HAPs	N/A
71	Development Lab Electric Oven	B	PM, VOC, HAPs	N/A
73	QA/QC Hood	B	PM, VOC, HAPs	N/A
74	QA/QC – Six Electric Ovens	B	PM, VOC, HAPs	N/A
75	Silicone Room Heat Exhaust	B	PM	N/A
Emission	Emission Unit Description	Citation	Pollutant(s) Emitted	Rated Capacity

Unit No.			(9 VAC 5-80-720 B)	(9 VAC 5-80-720 C)
T1	Solvent Tank	B	VOC	N/A
T2	Solvent Tank	B	VOC, HAPs	N/A
T3	Solvent Tank	B	VOC, HAPs	N/A
T5	Fuel Oil Tank	B	VOC	N/A
T6	Waste Oil Tank	B	VOC	N/A
T7	Raw Material Tank	B	VOC	N/A
T8	Raw Material Tank	B	VOC	N/A
T9	Raw Material Tank	B	VOC	N/A
BMO-PRS	Six Presses	B	VOC, HAPs	N/A
BPS-PRS	Thirty-Eight Presses	B	VOC, HAPs	N/A
BPS-EXT	Three Cold Feed Extruders	B	VOC, HAP, PM	N/A

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

A public notice regarding the draft permit appeared in the September 24 edition of the *Roanoke Times*. Public comments were accepted from September 25, 2000, through October 25, 2000. The only comments received were from USEPA Region III dated October 25, 2000. The final permit was revised to reflect these comments.

APPENDIX A: NSR/FOP CORRESPONDENCE TABLE

The following table is a modification of the table in the section Emission Unit Applicable Requirements – New Source Review Permit Requirements. This table is ordered corresponding to the NSR permit conditions as an aid to reference the corresponding federal operating permit conditions. The NSR permit follows in Appendix B.

NSR Condition	Title V Condition	Description	VAC Applicable Requirement
3	IV-A-1	BACT mixer particulate discharge	9 VAC 5-50-260
4	V-A-1	BACT Fluoroelastomer spray booth particulate discharge	9 VAC 5-50-260
5	VI-A-1	BACT Binks adhesive spray booth particulate discharge	9 VAC 5-50-260
6	IV-A-3	BACT as specified in design limit for appropriate control device	9 VAC 5-50-260
7	IV-A-4	Instrumentation to demonstrate proper equipment function	9 VAC 5-80-10, 9 VAC 5-50-20, 9 VAC 5-50-260
8	IV-A-5	Periodic monitoring for proper control device function	9 VAC 5-50-50
9	III-C-1, IV-C-1, V-C-1, VI-C-1, VII-D-1	Provide test ports at appropriate locations on request	9 VAC 5-50-30
10	IV-A-6	Proper particulate disposal	9 VAC 5-170-160
11	IV-A-2	Production limit on elastomer mixing	9 VAC 5-80-10
12	V-A-2	Throughput limit on VOC content of fluoroelastomer coatings	9 VAC 5-80-10
13	VI-A-2	Throughput limit on VOC content of Binks spray booth coatings	9 VAC 5-80-10
14	IV-A-8	Particulate emission limits for mixers	9 VAC 5-50-260
15	V-A-4	VOC emission limit for fluoroelastomer spray booth	9 VAC 5-50-260
16	VI-A-5	VOC emission limit for Binks adhesive spray booths	9 VAC 5-50-260
17	IV-A-7, V-A-3, VI-A-3	Visible emission limits for mixers, baghouse, and NSR permitted spray booths	9 VAC 5-50-80, 9 VAC 5-50-260
18	IV-C-2	Continuing compliance tests for baghouse	9 VAC 5-50-30
19	IV-C-3, V-C-2, VI-C-2	Continuing compliance tests for baghouse, and NSR permitted spray booths	9 VAC 5-50-30
20a	IV-B-1	Record of elastomer production in mixing	9 VAC 5-50-50
20b	V-B-1	Record of fluoroelastomer spray booth coating throughput	9 VAC 5-50-50
20c	VI-B-1	Record of Binks adhesive spray booths coating throughput	9 VAC 5-50-50
20d	V-B-2	Record of fluoroelastomer spray booth VOC throughput	9 VAC 5-50-50
20e	VI-B-3	Record of Binks adhesive spray booths VOC throughput	9 VAC 5-50-50
20f	V-B-3	Record of fluoroelastomer spray booth HAPs throughput	9 VAC 5-50-50
20g	VI-B-5	Record of Binks adhesive spray booths HAPs throughput	9 VAC 5-50-50
NSR	Title V	Description	VAC Applicable Requirement

Condition	Condition		
20h	IV-B-3	Baghouse differential pressure records	9 VAC 5-50-50
20i	V-B-5, VI-B-8	MSDS for coatings in NSR permitted spray booths	9 VAC 5-50-50
20j	VII-C-5	Records of stack tests & VEEs	9 VAC 5-50-50
20k	IV-B-4	Baghouse maintenance & training records	9 VAC 5-50-50
21	VII-E-1	Long term malfunction report	9 VAC 5-20-180
22	X-Q	Right of entry	9 VAC 5-170-130
23	VII-E-2	Notice of control equipment maintenance	9 VAC 5-20-180
24	X-F	Malfunction causing exceedence report	9 VAC 5-20-180
25	VII-A-2	Reduction or shutdown to avoid violation	9 VAC 5-20-180
26	VII-A-1	Maintenance & operation practice	9 VAC 5-50-20
27	X-V	Permit suspension/revocation	9 VAC 5-80-10
28	X-T	Change of ownership	9 VAC 5-80-10
29	X-L	Registration/update	9 VAC 5-170-60, 9 VAC 5-20-160
30	X-S	Permit Copy	9 VAC 5-170-160

APPENDIX B: NSR PERMIT DATE APRIL 17, 2000

The permit, with its own page numbering, follows.